

**REMARKS**

The specification has been corrected for purposes of clarity and grammar throughout.

5        Claims 1-10 have been amended, and new claims 11 and 12 have been added. Claims 11 and 12 have been added. Claims 11 and 12 are supported by the specification at page 10, lines 1-2. The application now includes claims 1-12.

10        Claim 1 was objected to for reciting “the obtained name of the location” at line 12 without sufficient antecedent basis. Claim 1 has been amended to strike the word “obtained”. Similarly, the word “obtained” has been deleted from claims 4, 8 and 9.

15        Claims 3-5 and 8-10 were objected to for having improper dependent form. Claims 3, 5, 8 and 10 have been revised to independent form, and now include the features of the recited base claims (as amended). The application now includes independent claims 1, 3, 5, 6, 8, and 10. A check in the amount of \$600 is attached to satisfy the fee for three additional independent claims.

20        Independent claims 1 and 6 have been amended to include the feature “wherein the peripheral information comprises report information that identifies a base station and electric field information measured by the cellular phone terminal unit.” Independent claims 3, 5, 8 and 10 also include this feature. This feature is supported by the text at page 9, line 20 through page 10, line 8.

25        Claim 1 was rejected under 35 USC 112, second paragraph, as being indefinite for reciting “the request”, since there are two types of requests in the present invention (the request for the location name, and the request for peripheral information). In response, the “request for the name of the location”, has been amended as the “location request”. This change has been made in all the claims where appropriate.

30        Claims 1, 3-6, and 8-10 were rejected under 35 USC 103(a) as being unpatentable over US patent 6,393,288 to Sollee et al in view of US patent 6,671,377 to Havinia et al. Claims 2 and 7 were rejected under 35 USC 103(a) as being unpatentable over Sollee et al. and Havinis et al., further in view of US patent 6,741,582 to Mansour. These rejections are traversed.

The present invention provides a system and components (e.g., a location name server) for inexpensively and quickly determining the location name of a cellular phone. In the present system, the cellular phone measures the electric field associated with each of a plurality of base stations. The cellular phone also determines report information that includes communication frequency and color code that the base stations use. The combination of report information and electric field information is referred to as the "peripheral information" in the present invention. The peripheral information allows the system to inexpensively determine the location name of the cellular phone. The base stations can even be base stations that are not part of the cellular phone subscriber network. In the present invention, the cellular phone user enters a name of the location of the cellular phone. The cellular phone measures the electric field and determines the report information at the named location. Then, the electric field information and report information is registered in a database in combination with the name of the location entered by the user. Hence, the names of different locations can be provided based on electric field information and report information.

It is important to note that the peripheral information does not necessarily allow calculation of the actual location of the cellular phone; the peripheral information allows a 1:1 correlation between location and the location name (i.e., the peripheral information allows discrimination between possible locations). The peripheral information (i.e., electric field and report information) vary with location so that an entered location name can be uniquely correlated with the peripheral information measured for each location.

The Office Action asserts that International Mobile Subscriber Identity (IMSI) and Temporary Mobile Subscriber Identity (TMSI) disclosed in Sollee et al. correspond to peripheral information of the present invention. This is erroneous for two reasons: 1) neither IMSI nor TMSI can be used to determine or discriminate the cellular phone location, and 2) neither IMSI nor TMSI comprise electric field information or report information as required in claims 1 and 6 as amended.

Firstly, in the present invention, the peripheral information must allow the system to uniquely correspond a location with the name of the location entered into the cellular phone (See page 11, lines 11-14). In other words, the peripheral information has unique values for different locations. Electric field information from several base stations, for

example, provides this ability. That is, each location has a unique electric field signature. These requirements of the peripheral information are arise from the location naming methods described in the present specification, particularly at page 11, lines 11-14, page 6, lines 16-21, page 7, lines 4-8, and page 13, lines 1-19.

5       The International Mobile Subscriber Identity (IMSI) and Temporary Mobile Subscriber Identity (TMSI) do not meet this requirement and so cannot be used as peripheral information. Specifically, IMSI and TMSI are not values that vary with phone location, and so the IMSI and TMSI cannot be used to determine the cellular phone location. The IMSI and TMSI are codes that uniquely identify the cellular phone or  
10       cellular phone user; they do not and cannot identify a location or distinguish between locations. Accordingly, the IMSI and TMSI are not peripheral information according to the present invention and cannot be used as peripheral information in the present invention. Hence, the rejections of claims 1-10 based on this interpretation of Sollee et al. must be withdrawn.

15       Secondly, all the present claims have been amended to specify that the peripheral information comprises electric field information and report information (e.g. communication frequency and color code). The IMSI and TMSI disclosed in Sollee et al. do not comprise electric field information or any other kind of measurement, or report information. Accordingly, the rejections based on Sollee et al. are traversed.

20       Also, it is important to note that neither Sollee et al. nor Havinis et al. teach or suggest a correspondence between peripheral information and location name, as required in the present invention. Sollee et al. teach a home location register (see col. 3, lines 57-61), but do not teach that the register can contain names for different locations identified by peripheral information. Havinis et al. teaches a method for downloading network  
25       information that allows calculation of location. Havinis et al. does not suggest a correspondence between location name and peripheral information specific for each location. For these additional reasons, any conceivable combination of Sollee et al. and Havinis et al. cannot include a correspondence between location-specific peripheral information and location name. Hence, the rejections of the claims must be withdrawn for  
30       this additional reason.

The Office Action has not relied upon Havinis et al. as teaching peripheral information or measurement of electric field information. It is noted that Havinis et al. does not teach or suggest electric field measurement or report information in determining the location of a cellular phone, and associating a name with the detected location.

5 Mansour does not make up for any of the deficiencies of Sollee and Havinis, and has been relied upon as teaching a registering a received set of peripheral information and a location name that are correlated with each other to a database. First, it is noted that Mansour does not teach what is stated in the office action, and is directed to a reconfiguration methodology for increasing cell capacity. Second, nothing in Mansour  
10 suggests a correspondence between location name and peripheral information, as required in the claim. Accordingly, no conceivable combination of Sollee et al. and Havinis et al., or any combination which also includes Mansour, can produce or make obvious to one of ordinary skill in the art the present invention as claimed.

In view of the foregoing, it is respectfully requested that the application be  
15 reconsidered, that claims 1-12 be allowed, and that the application be passed to issue.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

20 A provisional petition is hereby made for any extension of time necessary for the continued pendency during the life of this application. Please charge any fees for such provisional petition and any deficiencies in fees and credit any overpayment of fees for the petition or for entry of this amendment to Attorney's Deposit Account No. 50-2041 (Whitham, Curtis & Christofferson P.C.).

25 Respectfully submitted,  
  
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